

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 5:18-cr-00026

JAMES H. BLUME, JR.
MARK T. RADCLIFFE
MICHAEL T. MORAN
SANJAY MEHTA

MOTION TO SEAL EXHIBITS AT TRIAL

Comes now the United States of America by Monica D. Coleman, Assistant United States Attorney for the Southern District of West Virginia and moves this Court to allow the United States to admit exhibits at trial under seal. Specifically, the United States intends to introduce entire patient charts that contain a large amount of personal identifying information as well as medical histories of the patients. The records being admitted are voluminous and redacting the personal identifying information would be extremely difficult. As such, the United States proposes to submit the entire patient chart under seal and unredacted. However, any pages from the chart that the United States intends

to display to the jury will have personal identifying information redacted.

Respectfully submitted,

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United States Attorney

By:

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "Motion to Seal Exhibits At Trial" has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this 25th day of July, 2024 to:

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